

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 23-145 JWBLIB

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 113(a)(7)

v.

18 U.S.C. § 1151

18 U.S.C. § 1153

MARISSA MORRISON WAKONABO,

Minn. Stat. § 609.378, subdiv. 1(b)(1)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

**(Assault Resulting in Substantial Bodily Injury to a Person Under 16)**

On or about September 4, 2022, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

**MARISSA MORRISON WAKONABO,**

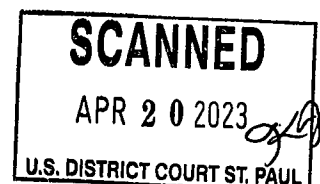
an Indian and parent of Minor Victim 1, a female Indian who has not attained the age of 16 years, did assault Minor Victim 1, resulting in substantial bodily injury, in that, the defendant physically threw Minor Victim 1 causing an arm fracture and other injuries, all in violation of Title 18, United States Code, Sections 113(a)(7), 1151, and 1153.

**COUNT 2**

**(Felony Child Endangerment)**

On or about September 4, 2022, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

**MARISSA MORRISON WAKONABO,**



*United States v. Marissa Morrison Wakonabo*

an Indian and parent of Minor Victim 1, a female Indian who has not attained the age of 18 years, did intentionally and recklessly cause and permit Minor Victim 1 to be placed in a situation that was likely to and did in fact result in substantial harm Minor Victim 1's physical, emotional, and mental health, all in violation of Title 18, United States Code, Sections 1151 and 1153, and Minnesota Statutes, Section 609.378, subdivision 1(b)(1).

**COUNT 3**  
**(Felony Child Endangerment)**

On or about September 4, 2022, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

**MARISSA MORRISON WAKONABO,**

an Indian and parent of Minor Victim 2, a female Indian who has not attained the age of 18 years, did intentionally and recklessly cause and permit Minor Victim 2 to be placed in a situation that was likely to and did in fact result in substantial harm Minor Victim 2's physical, emotional, and mental health, all in violation of Title 18, United States Code, Sections 1151 and 1153, and Minnesota Statutes, Section 609.378, subdivision 1(b)(1).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON